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EXHIBIT 17

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

KELLY WILSON,) Case No.
) 3:14-CV-01441-VC
Plaintiff,)
)
vs.)
)
THE WALT DISNEY COMPANY,)
DISNEY ENTERPRISES, INC.,)
WALT DISNEY PICTURES, and)
WALT DISNEY MOTION PICTURES)
GROUP, INC.,)
)
Defendants.)

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DEPOSITION OF PAUL BRIGGS
Burbank, California
Tuesday, January 20, 2015
Volume I

Reported by:
ROCHELLE HOLMES
CSR No. 9482
Job No. 1995955
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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
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4 KELLY WILSON,) Case No.
5) 3:14-CV-01441-VC
6 Plaintiff,)
7)
8 vs.)
9)
10 THE WALT DISNEY COMPANY,)
11 DISNEY ENTERPRISES, INC.,)
12 WALT DISNEY PICTURES, and)
13 WALT DISNEY MOTION PICTURES)
14 GROUP, INC.,)
15 Defendants.)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

Deposition of PAUL BRIGGS, taken on behalf of
Plaintiff, at 2100 Riverside Drive, Room 040, Burbank,
California, beginning at 1:05 p.m. and ending at 5:11
p.m. on Tuesday, January 20, 2015, before ROCHELLE
HOLMES, Certified Shorthand Reporter No. 9482, Certified
Realtime Reporter No. 0123.

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1 different ideas that we were going to draw.

2 Q Okay.

3 MR. KLAUS: When you get to a good stopping point.

4 MS. BARTEAU: Do you want a break?

5 THE WITNESS: I would love a break.

6 MS. BARTEAU: Absolutely, let's take a break.

7 (A brief recess was taken.)

8 MR. KLAUS: While we are back on the record, given
9 that the questioning has gone through documents that
10 have been designated confidential, I would ask
11 Ms. Holmes to please designate the transcript as
12 confidential. Thank you.

13 Q BY MS. BARTEAU: Mr. Briggs, if you would go
14 back to Page 1 of the brainstorm notes, I realize that
15 there are some initials here that I don't see
16 corresponding names for up top, so maybe you can shed
17 some light on this.

18 There is a first set of notes starting with
19 "DM" ending with "JL," and then it starts with "LD."

20 Do you see that?

21 A Uh-huh.

22 Q Do you know who LD is?

23 A The best of my memory would be Lino DiSalvo.

24 Q Okay. Do you know why Lino was not a recipient
25 on the e-mail with the notes?

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1 A No.

2 Q Do you recall working with anyone with the
3 initials MP on the teaser trailer?

4 A Not to my -- for this meeting, honestly, I
5 can't remember.

6 Q Six lines down from MP it says, "MS."
7 Do you know who that is?

8 A To my best recollection, it was Mark Smith,
9 also a story artist.

10 Q Part of your crew?

11 A Yes.

12 Q And two lines down from MS it says "HO."
13 Do you know who that was?

14 A I don't, no.

15 Q Could that be Hyrum Osmond?

16 A It could be.

17 Q Do you recall him being at that first meeting?

18 A I do know we had a couple of animators
19 involved. It may have been him, but I'm not
20 100 percent.

21 Q To your knowledge besides these notes that we
22 are looking at right now, is there any other records
23 kept of the meeting in terms of who attended the
24 meeting?

25 A To my knowledge, no.

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1 mouth."

2 Is that something that John Lasseter said at
3 that meeting?

4 MR. KLAUS: The paragraph here or just that
5 sentence?

6 Q BY MS. BARTEAU: Yeah. That whole paragraph.
7 I'm wondering the JL, do you know if that's referring to
8 John Lasseter?

9 A JL is referring to John Lasseter.

10 Q Okay. Do you recall how that meeting started?
11 It's a little just confusing looking at these notes.
12 You know, it just seems kind of out of the blue, "I
13 would love to get one thing where Olaf's got the twig in
14 his mouth."

15 What happened before this statement?

16 A I'm sure context was set for the meeting of,
17 John, we are going to pitch you -- we are going to pitch
18 you a bunch of ideas that we have all been working on,
19 and they were probably just Olaf and Sven ideas, just a
20 very general description of what we were about to pitch.
21 And this probably stemmed from a reaction just to
22 hearing like, here is what you are going to be seeing.

23 Q So do you recall if people shared their ideas
24 prior to John saying this or did John open the meeting
25 with saying what he would like to see in the teaser?

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1 A I believe we pitched after he had spoken. We
2 pitched, here's the ideas we have.

3 Q And these storyboards that we just looked at,
4 which were marked as Exhibit 7, were those presented to
5 John at this meeting on January 15th, 2013?

6 A Yes, they were.

7 Q And when you present storyboards, are they on
8 paper or are they up on the wall on big boards or help
9 me understand how you use the storyboards in the
10 meetings.

11 A For this specific meeting, I believe these were
12 all pitched, projected on a screen from our computer,
13 working off our network and pitching digitally,
14 basically.

15 Q Okay.

16 A But I want to be clear though, too, some
17 artists don't draw digitally. Some draw -- like Don
18 Dougherty drew all these on paper, had those drawings
19 scanned, and then he presented them digitally, or
20 projected.

21 Q Okay. So if the storyboards were projected and
22 you think that you gave your pitch after John spoke, do
23 you think that John had seen the storyboards prior to
24 making the statement of what he would love to see or do
25 you think he saw the storyboards after making that

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